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September 14, 2017

RECEIVED. SEP 19 2017 *Ad ESS*

Via Overnight Delivery

Mr. Fouad Dababneh
Enforcement Specialist
U.S. Environmental Protection Agency, Region 5
Superfund Division – Emergency Response
Branch #2
Enforcement Services Section, SE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Spill Site Identification Number: C54L
AA Oil Site, 2340 South Tibbs Avenue, Indianapolis, Indiana (“Site”)
Response To Information Request Pursuant To Section 104(e) Of CERCLA

Dear Mr. Dababneh:

I write to you on behalf of FCA US LLC (“FCA”) in response to the letter dated August 23, 2017 from Jason El-Zein of the U.S. Environmental Protection Agency (“US EPA”) to Sergio Marchionne of FCA, which FCA received on August 25, 2017.

Please find enclosed information FCA believes to be responsive to US EPA’s Information Request regarding the Site enclosed with Mr. El-Zein’s letter (“Information Request”). FCA has done a diligent investigation in response to the Information Request, including efforts to contact employees, contractors and representatives, and to locate/review records. If additional information or documents responsive to the Information Request become known or available to FCA after the date of this response, then FCA will provide such supplemental information to US EPA.

Please note that FCA objects to the broad requests for any information concerning acts or omissions unrelated to the Site, which is outside the authorization of Section 104(e) of CERCLA because it is not relevant to the identification, nature and quantity of materials that may have been released at the Site.



Mr. Fouad Dababneh
September 14, 2017
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Please direct all future communications concerning FCA and the Site to me, and please feel free to contact me, if you have any questions regarding any of the subjects covered above.

Thank you for your attention to this matter.

Very truly yours,

DYKEMA GOSSETT PLLC

A handwritten signature in black ink, appearing to read 'Grant P. Gilezan'.

Grant P. Gilezan

Enclosure

California | Illinois | Michigan | Minnesota | Texas | Washington, D C.

September 14, 2017 Response To August 23, 2017 EPA Request For Information
AA Oil Site, 2340 South Tibbs Avenue, Indianapolis, Indiana
Site Spill Identification Number: C54L

Presented below is information FCA US LLC ("FCA") is providing in response to the U.S. Environmental Protection Agency ("US EPA") Information Request included as Enclosure D with the letter dated August 23, 2017 from Jason El-Zein of US EPA to Sergio Marchionne of FCA US LLC ("Information Request").

Response To Information Request 1

Louis A. Johnston
Manager, Corporate Environmental
FCA US LLC
38111 Van Dyke, CIMS 482-00-51
Sterling Heights, MI 48312
248-576-7357

Grant P. Gilezan, Esq.
Dykema Gossett, PLLC
400 Renaissance Center – 36th Floor
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313-568-6789

Response To Information Request 2

Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning the Site, other than as specifically included in the responses below.

Response To Information Request 3

According to the Site History included as Enclosure A, and to the meaning of "period being investigated" and "the relevant time period" set forth in Paragraph 7 of the Definitions included as Enclosure C (January 1, 1950 to January 1, 1990), with the letter dated August 23, 2017 from Jason El-Zein of US EPA, the Site ceased operations and the period of time covered by the Information Request are both prior to the existence of FCA and to the bankruptcy action concerning Old Carco LLC. All Old Carco LLC files and records are understood to be in the custody of Jones Day, 51 Louisiana Avenue, N.W., Washington, DC 20001.

Response To Information Request 4

This representative of Old Carco LLC may have information concerning the Site: Kevin P. Holewinski, Esq., Jones Day, 51 Louisiana Avenue, N.W., Washington, DC 20001.

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AA Oil Site, 2340 South Tibbs Avenue, Indianapolis, Indiana
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Response To Information Request 5

FCA has active operations.

Response To Information Request 6

FCA is a limited liability company formed in 2014 as a subsidiary of Fiat Chrysler Automobiles N.V., a corporation incorporated in the Netherlands.

Response To Information Request 7

See response to Information Request 6.

Response To Information Request 8

FCA objects to this request as it calls for information that is not related to the Site, irrelevant, overbroad, burdensome and not within the authority of Section 104(e) of CERCLA. Subject to this objection, FCA responds that it is an automotive manufacturer.

Response To Information Request 9

FCA did not generate or arrange for transportation of waste to the Site. Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning the generation or arrangement for transportation of waste to the Site by any other entity.

Response To Information Request 10

Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning current or former FCA employees who have knowledge of the generation, transport and disposal of wastes at the Site.

Response To Information Request 11

FCA did not transport or dispose of materials at the Site. Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning the transportation or disposal of materials at the Site by any other entity.

Response To Information Request 12

FCA did not transport oil to the Site. Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning the transportation of oil to the Site by any other entity.

Response To Information Request 13

FCA did not transport hazardous waste to the Site. Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning the transportation of hazardous waste to the Site by any other entity.

Response To Information Request 14

FCA objects to this request as it calls for information that is not related to the Site, irrelevant, overbroad, burdensome and not within the authority of Section 104(e) of CERCLA. Subject to this objection, FCA responds that it did not exist during the “period being investigated” and “the relevant time period” set forth in Paragraph 7 of the Definitions included as Enclosure C (January 1, 1950 to January 1, 1990) with the letter dated August 23, 2017 from Jason El-Zein of US EPA, and that Old Carco LLC may have responsive information.

Response To Information Request 15

FCA objects to this request as it calls for information that is not related to the Site, irrelevant, overbroad, burdensome and not within the authority of Section 104(e) of CERCLA. Subject to this objection, FCA responds that it did not exist during the “period being investigated” and “the relevant time period” set forth in Paragraph 7 of the Definitions included as Enclosure C (January 1, 1950 to January 1, 1990) with the letter dated August 23, 2017 from Jason El-Zein of US EPA, and that Old Carco LLC may have responsive information.

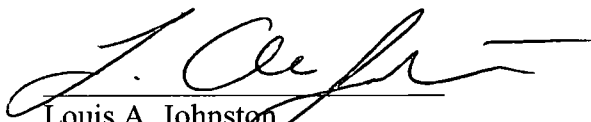
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Response To Information Request 16

FCA has not communicated with Site owners and operators regarding materials that came to be located at the Site. Based on a diligent investigation, including efforts to contact employees, contractors and representatives, and to locate/review records, and based on the information currently available to FCA, FCA has not located documents, information or other knowledge concerning correspondence by any other entity with Site owners and operators regarding materials that came to be located at the Site.

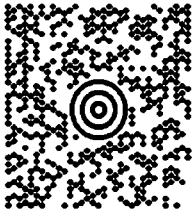



Certification:

I, Louis A. Johnston, in my capacity as Manager, Corporate Environmental, FCA US LLC, certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the personnel directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Louis A. Johnston
Manager, Corporate Environmental
FCA US LLC

Dated: September 14, 2017

HOLLY WARRINGTON 248-512-2680 FCA 1000 CHRYSLER DRIVE AUBURN HILLS MI 48326		1.0 LBS LTR 1 OF 1
SHIP TO: U.S. EPA, REGION 5 312-353-2000 MR. FOUAD DABABNEH 77 WEST JACKSON BOULEVARD BRANCH#2 ENFRMNT. SVCS. SEC. SE-5J SUPERFUND DIV.-EMERGENCY RESPONSE CHICAGO IL 60604		
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